

ETHAN P. DAVIS
Acting Assistant Attorney General
BILLY J. WILLIAMS
United States Attorney
DAVID M. MORRELL
Deputy Assistant Attorney General
ALEXANDER K. HAAS
Director, Federal Programs Branch
BRIGHAM J. BOWEN
Assistant Director, Federal Programs Branch
ANDREW I. WARDEN
Senior Trial Counsel
JEFFREY A. HALL
JORDAN L. VON BOKERN (DC 1032962)
KERI L. BERMAN
Trial Attorneys
U.S. Department of Justice
Civil Division
1100 L Street, NW
Washington, D.C. 20530
Tel.: (202) 616-7919
Fax: (202) 616-8460

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

INDEX NEWSPAPERS, LLC, *et al.*,

Plaintiffs.

v.

CITY OF PORTLAND, *et al.*,

Defendants.

Case No. 3:20-cv-1035-SI

**FEDERAL DEFENDANTS’
UNOPPOSED MOTION TO FILE
UNDER SEAL DOCUMENTS
SUPPLEMENTING FEDERAL
DEFENDANTS’ OPPOSITION TO
A PRELIMINARY INJUNCTION**

L.R. 7-1 Certification

Federal Defendants conferred on this Motion with counsel for the other parties, and they do not oppose this Motion.

MOTION TO FILE UNDER SEAL

Federal Defendants submit this motion to file two exhibits to Federal Defendants' Opposition to a Preliminary Injunction under seal after the Court conducts an *in camera* review.

Plaintiffs filed a motion for a preliminary injunction against Federal Defendants on August 10, 2020. ECF Nos. 133, 134. Federal Defendants have filed an opposition to that motion. ECF No. 138. Federal Defendants have attached, as exhibits to that opposition filed on the public docket, two declarations in support of that opposition, in which the federal law enforcement officer declarants are identified only as CBP SOG-1 and CBP SOD-1.

Federal Defendants seek to file versions of those declarations with the officers' names and signatures, as Exhibits 1 and 2, under seal after the Court reviews them *in camera*. Previously, this Court granted a similar motion to file documents under seal containing the names of federal law enforcement officers given the potential threats to such officers if their names (and by extension, their other personal information) were disclosed. ECF Nos. 103, 104. Similarly, this Court entered a stipulated protective order recognizing that the personally identifiable information of federal law enforcement officers should be protected because release of the names "could endanger the privacy and safety of such officers." ECF No. 131 at 2-3.

For the same reasons, Federal Defendants respectfully request that the Court issue an order permitting the filing under seal of Exhibits 1 and 2.

Dated: August 12, 2020

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Acting Assistant Attorney General

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ANDREW I. WARDEN
Senior Trial Counsel

/s/ Jordan L. Von Bokern
JORDAN L. VON BOKERN (DC 1032962)
JEFFREY A. HALL
KERI L. BERMAN
Trial Attorneys
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Civil Division
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PROPOSED ORDER

ORDER

This matter comes before the Court on *Federal Defendants' Unopposed Motion to File Under Seal Documents Supplementing Federal Defendants' Opposition to a Preliminary Injunction* (Dkt. No.). Upon consideration of the Federal Defendants' Motion, and the entire record of this case, it is hereby

ORDERED that the Motion is GRANTED.

Other than the parties and counsel for the parties, only this Court and its staff may review, copy, photograph, and/or inspect the materials.

SO ORDERED.

Hon. Michael H. Simon
UNITED STATES DISTRICT JUDGE
United States District Court for the District of Oregon

Dated: _____